



THE WORLDWIDE LEADER IN SPORTS™

February 6, 2006

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Mobile ESPN, LLC**  
**Certification of CPNI Filing (February 6, 2006)**  
**EB Docket No. 06-36; EB-06-TC-060**

Dear Ms. Dortch:

Pursuant to the January 30, 2006 public notice released by the Federal Communications Commission ("Commission"), Mobile ESPN, LLC ("Mobile ESPN"), a mobile virtual network operator, hereby submits a certificate of compliance with Part 74, Subpart U of the Commission's rules governing the use of customer proprietary network information ("CPNI") by telecommunications carriers.

Although Mobile ESPN has been marketing its cellular products and services on a limited basis since November 2005 via the Internet and in certain retail outlets in several markets, the official commercial launch of the Mobile ESPN service did not occur until yesterday, February 5, 2006. Accordingly, Mobile ESPN has not yet been in operation for a sufficient period of time to previously have been required under Section 64.2009(e) of the FCC's rules to file an annual CPNI certification. Thus, the attached CPNI compliance certification is the first that Mobile ESPN has filed with the Commission.

Please do not hesitate to contact the undersigned with any questions regarding this matter.

Sincerely,

David Ryder  
Vice President, Operations  
Mobile ESPN, LLC

Enclosure

cc: Byron McCoy, FCC (via email)

ESPN, Inc.  
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**Certificate of Compliance of Mobile ESPN, LLC  
Pursuant to Section 64.2009(e)  
of the Rules of the Federal Communications Commission**

**February 6, 2006**

I, David Ryder, Vice President of Operations of Mobile ESPN, LLC ("Mobile ESPN"), hereby certify that Mobile ESPN has established operating procedures adequate to ensure compliance with Part 74, Subpart U of the rules of the Federal Communications Commission ("Commission"), which governs the use of customer proprietary network information ("CPNI") by telecommunications carriers.

Although Mobile ESPN has been marketing its cellular products and services on a limited basis since November 2005 via the Internet and in certain retail outlets in four markets, the commercial launch of Mobile ESPN's service did not occur until yesterday, February 5. Accordingly, Mobile ESPN has had access for no more than three months to the CPNI of only a very small number of customers.

Mobile ESPN has not used its customers' CPNI for any purpose for which customer consent is required under the Commission's rules. Moreover, Mobile ESPN has not disclosed its customers' CPNI to any third party other than Mobile ESPN's agents (e.g., Mobile ESPN's billing systems vendor) as necessary for Mobile ESPN to provide cellular service to its customers. Consequently, Mobile ESPN has not sought "opt in" or "opt out" consent from its customers.

Mobile ESPN strictly limits its employees' access to its customers' CPNI and educates and trains its employees that disclosure of CPNI to anyone under any circumstances may result in disciplinary action up to and including immediate termination.

Mobile ESPN will comply with all CPNI safeguards imposed by the Commission prior to using or disclosing CPNI in any manner for which customer consent is required.

David Ryder  
Vice President of Operations  
Mobile ESPN, LLC